

Honorable Michelle Peterson

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

Defendant Gonzalez-Torres hereby responds to the Government's Motion for Detention, and requests that this Court order his pre-trial release upon conditions it deems appropriate.

Defendant Gonzalez-Torres is a 24-year-old, U.S. citizen, with no prior arrests, charges or convictions. He was born, and primarily raised in Washington.

1 Undersigned counsel has verified that he works full time as a carpenter for
2 Greater Seattle Concrete (17010 9th Ave. SE, Mill Creek, WA; gsconcrete.com). His
3 supervisor is aware of his recent arrest, but is anxious for Mr. Gonzalez-Torres to be
4 released so that he can return to full time work.
5

6 Mr. Gonzalez-Torres has lived in the same apartment for the last two years;
7 and he is in frequent contact with his brothers: Edgar Gonzalez-Torres, who also
8 lives in Western Washington; and Ernesto Gonzalez-Torres, who is serving our
9 country in the U.S. Marines.
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11 Although Mr. Gonzalez-Torres' parents live in Mexico, he has not visited
12 them in over six years. His passport expired years ago and is lost.
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14 Mr. Gonzalez-Torres admits to some excessive drinking as well as recreational
15 drug usage. He is willing to participate in whatever evaluation, testing and/or
16 treatment that this Court might deem appropriate.
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18 For the reasons stated above, we request that this Court authorize the pre-trial
19 release of Defendant Gonzalez-Torres on conditions it deems appropriate.
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21 RESPECTFULLY SUBMITTED this 8th day of September, 2020,
22

23 s/ Scott J. Engelhard
24 Scott J. Engelhard
25 WSBA #13963
Attorney for Defendant

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2 CERTIFICATION OF SERVICE
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4 I hereby certify that on the date provided below, I filed the foregoing with the Clerk of the Court and the Plaintiff
5 using the CM/ECF system.
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7 Respectfully submitted this 8th day of September, 2020,
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9 s/ Scott J. Engelhard
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11 Scott J. Engelhard, WSBA #13963
12 Attorney for Defendant
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